

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

PULSEDATA, INC.,)	
)	
<i>Plaintiff,</i>)	
v.)	Civ. No. 1:23-cv-03653-JMF
JUNG HOON SON,)	
)	
<i>Defendant.</i>)	

NOTICE OF MOTION FOR PRELIMINARY INJUNCTION

PLEASE TAKE NOTICE that upon the Declaration of Hai Po Sun and exhibits attached thereto, Declaration of Steven J. Pacini, and the accompanying Memorandum of Law, the undersigned, on behalf of Plaintiff, PulseData, hereby moves this Court before the Honorable Jesse M. Furman, in Courtroom 1105 of the United States Courthouse for the Southern District of New York, 40 Foley Square, New York, New York 10007 for an order granting a preliminary injunction and for such other relief as this Court deems just and proper pursuant to Fed. R. Civ. P. 65(a), enforcing Jung’s Non-Disclosure Agreement, and preliminarily (1) prohibiting Jung from disclosing and/or using any of pulseData’s confidential and/or trade secret information; and (2) requiring Jung to return all originals and copies of all pulseData trade secrets, confidential information, proprietary information, or other pulseData property.

Dated: June 30, 2023
New York, New York

Respectfully submitted,

/s/ Matthew S. Salerno

Matthew S. Salerno
LATHAM & WATKINS LLP
1271 Avenue of the Americas
New York, NY 10020-1401
Phone: 212.906.1200
Email: matthew.salerno@lw.com

Attorneys for pulseData, Inc.